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7 Special Counsel to the Chapter 11 Trustee,  
Richard A. Marshack

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9  
10 **UNITED STATES BANKRUPTCY COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**  
12

13 In re:

14 THE LITIGATION PRACTICE GROUP P.C.,  
15 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

**SUPPLEMENTAL DECLARATION OF  
CHRISTOPHER CELENTINO  
SUPPLEMENTING DISCLOSURES  
RELATING TO DINSMORE & SHOHL  
LLP EMPLOYMENT AS SPECIAL  
COUNSEL FOR CHAPTER 11 TRUSTEE  
RICHARD A. MARSHACK**

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21 I, Christopher Celentino, declare:

22 I am an attorney duly licensed to practice before this Court. I am a Partner of the law firm  
23 Dinsmore & Shohl LLP ("Dinsmore"), Special Counsel to Richard A. Marshack, Chapter 11 Trustee  
24 (the "Trustee"). I make this Declaration based on personal knowledge and if called to testify to the  
25 truthfulness of its contents, could and would do so competently.

26 1. The facts stated below are personally known to me, except for those matters based  
27 upon information and belief and as to those, I believe them to be true. If called as a witness, I could  
28 and would competently testify to the truth of such facts.

1           2.       On or about June 7, 2023, Trustee filed its APPLICATION PURSUANT TO 11  
2 U.S.C. SECTION 327(a) AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
3 DINSMORE & SHOHL LLP AS SPECIAL COUNSEL FOR CHAPTER 11 TRUSTEE RICHARD  
4 A. MARSHACK (the "Application")<sup>1</sup> [Dkt. No. 90] with the accompanying DECLARATION OF  
5 CHRISTOPHER CELENTINO IN SUPPORT OF APPLICATION PURSUANT TO 11 U.S.C.  
6 SECTION 327(a) AUTHORIZING THE RETENTION AND EMPLOYMENT OF DINSMORE &  
7 SHOHL LLP AS SPECIAL COUNSEL FOR CHAPTER 11 TRUSTEE RICHARD A.  
8 MARSHACK (the "Celentino Declaration") [Dkt. No. 90-1]. This court entered its ORDER  
9 APPROVING APPLICATION PURSUANT TO 11 U.S.C. SECTION 327(a) AUTHORIZING  
10 THE RETENTION AND EMPLOYMENT OF DINSMORE & SHOHL LLP AS SPECIAL  
11 COUNSEL FOR CHAPTER 11 TRUSTEE RICHARD A. MARSHACK [Dkt. No. 171].

12           3.       I submit this Supplemental Declaration to disclose supplemental connections in  
13 relation to the Case.

14           4.       On or about April 15, 2024, Dinsmore employed Matthew J. Stockl as an associate  
15 in Dinsmore's Los Angeles office. Mr. Stockl was previously employed by Winthrop Golubow  
16 Hollander, LLC, where he was involved in the representation of MCDVI Fund 2 LLC, Debt  
17 Validation fund II, LLC and related entities (the "MC DVI Entities") in the Case adverse to the  
18 Trustee. Mr. Stockl has withdrawn from representation of the MC DVI Entities. In order to prevent  
19 the disclosure of any confidential information, Dinsmore has implemented an ethical screen which  
20 will prevent Mr. Stockl from viewing or obtaining information related to the MC DVI Entities. The  
21 screen will also ensure that Mr. Stockl will not communicate with the Dinsmore attorneys  
22 representing the Trustee in connection with the MC DVI entities. In compliance with the Rules of  
23 Professional Conduct, Trustee was notified of Mr. Stockl's prior representation and provided his  
24 written consent of Mr. Stockl's employment with Dinsmore and provided consent that Mr. Stockl  
25 may perform duties in the Case for the Trustee unrelated to the MC DVI Entities. In addition,

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28 <sup>1</sup> Terms not otherwise defined herein shall have the meaning ascribed to them in the Application.

1 Dinsmore secured the consent of Mr. Stockl's prior clients to his employment, and disclosed the  
2 ethical screen in relation to same.

3 5. On or about July 1, 2024, Dinsmore and Summer Shaw entered into an agreement  
4 whereby Ms. Shaw would be employed as a contract attorney with Dinsmore to represent clients  
5 unrelated to the Case; Ms. Shaw maintains her office outside of the Dinsmore offices. Ms. Shaw is  
6 the fiancé of Trustee in the Case. I am informed and believe that the Trustee has disclosed  
7 Dinsmore's intention to employ Ms. Shaw to the Committee appointed in the Case, and the  
8 Committee counsel has consented to the ethical screen arrangement. In order to prevent the  
9 disclosure of any confidential information, Dinsmore has implemented an ethical screen which will  
10 prevent Ms. Shaw from viewing or obtaining information related to the Case. The screen will also  
11 ensure that Ms. Shaw will not communicate with the Dinsmore attorneys regarding the Case.

12 I declare under penalty of perjury under the laws of the State of California and the United  
13 States of America that the foregoing is true and correct and that this declaration was executed on  
14 this 17th day July, 2024 at San Diego, California.

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16 /s/ Christopher Celentino  
Christopher Celentino  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document: **SUPPLEMENTAL DECLARATION OF CHRISTOPHER CELENTINO SUPPLEMENTING DISCLOSURES RELATING TO DINSMORE & SHOHL LLP EMPLOYMENT AS SPECIAL COUNSEL FOR CHAPTER 11 TRUSTEE RICHARD A. MARSHACK**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 17, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On July 17, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

YCIR Inc.  
Hector Ocegueda  
535 S Barranca St #4  
Covina, CA 91723

**JUDGE'S COPY**

The Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 17, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 17, 2024  
Date

Caron Burke  
Printed Name

/s/ Caron Burke  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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